

PHILLIP A. TALBERT  
United States Attorney  
KATHERINE T. LYDON  
DHRUV M. SHARMA  
Assistant United States Attorneys  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ROBERT ALLEN POOLEY,  
  
Defendant.

CASE NO. 2:21-CR-00111 WBS  
  
NOTICE OF SECOND AMENDMENTS TO  
GOVERNMENT'S EXHIBIT LIST  
  
DATE: May 15, 2024  
TIME: 9:00 a.m.  
COURT: Hon. William B. Shubb

The United States, by and through its undersigned counsel, hereby submits its notice of second amendments to the list of exhibits it may mark for identification or introduce in its case-in-chief. Each change or addition has been noted below in track changes.

<u>EXH. NO.</u>	<u>DESCRIPTION</u>	<u>BATES RANGE</u>	<u>IDENTIFIED</u>	<u>ADMITTED</u>
Exhibits Constituting Counts Charged in Indictment				
1	Email from Parachute Center to Rob Pooley dated June 28, 2016, forwarding message from Fabricio Palomino (Skydive Baja) re: tandem ratings	POOLEY_00030967		

1a	<u>Email from Parachute Center to Rob Pooley dated June 28, 2016, forwarding message from Fabricio Palomino (Skydive Baja) re: tandem ratings</u>	<u>POOLEY_00301121</u>		
2	June 29, 2016 email from Robert Pooley to Fabricio Palomino providing information about the "Tandem Course," including that it will cost \$1,100, and ending, "Look forward to seeing you around July 6 <sup>th</sup> ."	POOLEY_00020999		
3	July 4, 2016 Email from Fabricio Palomino to Pooley stating that Pooley was "on my way to Lodi," and asking where Victim 1 could get his "Airmans [sic] Medical."	POOLEY_00020940		
4	August 1, 2016 Email from Pooley to a USPA representative and Morgan Mackay attaching a USPA Tandem Instructor Rating Course Proficiency Card for Morgan Lachlan Mackay, bearing multiple purported signatures of Yuri Garmashov	POOLEY_00023987, POOLEY_00023985- POOLEY_00023986		
5	USPA D license application, USPA Tandem Instructor Rating Course Proficiency Card, and UPT Tandem Instructor Certification Form for YongHyeon Kwon, bearing Yuri Garmashov's signature	POOLEY_00019055- POOLEY_00019065		
6	USPA Tandem Instructor Rating Course Proficiency Card for Morgan Lachlan Mackay, bearing Yuri Garmashov's signature dated on or about August 1, 2016	POOLEY_00023987, POOLEY_00023985- POOLEY_00023986		
Photos of Relevant Persons				
7	<u>Excerpt</u> <del>Photograph</del> of Robert Pooley's <del>taken from</del> DMV file	POOLEY_00001926		

7p	<u>Photograph of Robert Pooley taken from DMV file</u>			
8	<u>Excerpt <del>Photo of</del> of Bill Dause's <del>taken from</del> DMV file</u>	POOLEY_00001920		
8p	<u>Photo of Bill Dause taken from DMV file</u>			
9	<u>Excerpt of <del>Photo of</del> Yuri Garmashov's <del>taken from</del> DMV file</u>	POOLEY_000 <del>334300</del> <del>1936</del>		
9p	<u>Photo of Yuri Garmashov taken from DMV file</u>			
10	Picture of YongHyeon Kwon taken from border records	POOLEY_00030931		
11	Picture of Fabricio Palomino taken from border records	POOLEY_00030933		
12	Picture of Fabian Munoz taken from border records	POOLEY_00030932		
13	Picture of Carlos Obaid taken from border records	POOLEY_00030930		
14	Picture of Carlos Martinez taken from border records	POOLEY_00030928		
15	Picture of Lachlan Morgan Mackay taken from border records	POOLEY_00030926		
16	Picture of Danny Overeem taken from border records	POOLEY_00030929		
17	<u>Excerpt of Katherine Dause's DMV File</u>	<u>POOLEY_000334444</u>		
17	<u>Photo of Katherine Dause taken from DMV File</u>			
Exhibit pertaining to Fabricio Palomino				
20	October 31, 2016, email from between Palomino, Pooley and Parachute Center re: refund	POOLEY_00023217		
21	June 28, 2016, email from Fabricio Palomino to Parachute Center inquiring about "getting my tandem ratings with you guys" and seeking information about examiners and cost.	POOLEY_00002515		
22	Text message chain between Fabricio Palomino and Sergii	POOLEY_00024050- POOLEY_00024052		
22r	Text message chain between Fabricio Palomino and Sergii	POOLEY_00024050- POOLEY_00024052		

23	Text message chain between Fabricio Palomino and Yuri Garmashov	POOLEY_00024054- POOLEY_00024056		
24	Photos of Fabricio Palomino tandem skydiving captioned "Tandem Ratings" dated July 8, 2016	POOLEY_00029447- POOLEY_00029448		
25	Fabricio Palomino border crossing card	POOLEY_00024085		
Exhibits pertaining to Brad North				
30	Brad North's USPA/UPT paperwork, including UPT Tandem Instructor Certification Form and USPA Tandem Instructor Rating Course Proficiency Card	POOLEY_00029460- POOLEY_00029472		
31	Screenshot of Facebook Messenger conversation with Pooley	POOLEY_00023120		
32	Text messages exchanged between Brad North and Robert Pooley	POOLEY_DEFENSE _00301-00306		
Exhibits pertaining to Fabian Munoz				
40	Photograph of Munoz and friends at Parachute Center	POOLEY_00018870		
41	Video of Munoz conducting tandem jump with customer	POOLEY_00018872		
41a	Excerpts from video of Munoz conducting tandem jump with customer, 0:32 – 1:55	POOLEY_00018872		
42	Border crossing record reflecting Fabian Munoz entered the U.S. July 6, 2016 and left the U.S. August 5, 2016	POOLEY_00030912- POOLEY_00030913		
Exhibits pertaining to Kwon				
50	Certification for Border crossing document pertaining to YongHyeon Kwon	POOLEY_00027570		
51	Border crossing documents reflecting that Kwon flew into the U.S. on June 21, 2016	POOLEY_00027566- POOLEY_00027569		
Exhibits pertaining to Garmashov				
60	Certification for border crossing documents	POOLEY_00002016		

61	Border crossing documents reflecting that Garmashov flew from SFO to Haneda City, Tokyo on May 20, 2016, and returned to the U.S. on a flight from Helsinki, Finland to JFK on August 2, 2016	POOLEY_00002017- POOLEY_00002027		
62	DMV record pertaining to Garmashov's CA driver's license reflecting his signature	POOLEY_00001936		
Exhibits pertaining to FAA Inspector David Jensen				
70	August 12, 2016 email from Garmashov to Jensen	POOLEY_00020551 POOLEY_00020548 POOLEY_00020549 POOLEY_00020550		
70r	Redacted version of August 12, 2016 email from Garmashov to Jensen and attachments	POOLEY_00020551 POOLEY_00020548 POOLEY_00020549 POOLEY_00020550		
71	September 24, 2016 email from Garmashov to David Jensen re Kwon documents and attachment	POOLEY_00020439 POOLEY_00020429- 20438		
USPA Documents				
80	2014-2015 USPA Instructional Rating Manual	POOLEY_00025078- POOLEY_00025407		
81	2016-2017 Instructional Rating Manual	POOLEY_00023256- POOLEY_00023573		
82	2014-2015 Skydiver's Information Manual	POOLEY_00024493- POOLEY_00024762		
84	2016-2017 Skydiver's Information Manual	POOLEY_00024221- POOLEY_00024492		
85	February 24, 2014 email from Jason Putnam Gordon to Pooley re: disciplinary letter and attachment	POOLEY_00020754- POOLEY_00020756		
UPT Documents				
100	Tandem Examiner Guide Lines for the Certification of Tandem Instructors – Revised April 21, 2010	POOLEY_00023131- POOLEY_00023205		
101	Tandem Examiner Guide Lines for the Certification of Tandem Instructors – Revised January 2013	POOLEY_00018950- POOLEY_00019024		
102	Pooley 2010 Tandem Examiner Certification Form	POOLEY_00033073- <del>00033081</del>		

103	Pooley 2014 Tandem Examiner Re-Certification Form, with Letter of Re-Certification from Jay Stokes	POOLEY_00033067- <u>POOLEY_00033068</u> , <u>POOLEY_00033070</u>		
104	Pooley 2015 Tandem Examiner Re-Certification Form	POOLEY_00033071- <u>POOLEY_00033072</u>		
<u>105</u>	<u>Pooley 2006 Tandem Instructor Forms</u>	<u>POOLEY_00033077-</u> <u>POOLEY_00033095</u>		
Excerpts from Pooley's January 21, 2020 Deposition				
201.1	Entire deposition (first half of recording)	POOLEY_00027092		
201.2	Entire deposition (second half of recording)	POOLEY_00027093		
202	Deposition transcript	POOLEY_00002272- POOLEY_00002371		
203	6:12 – 7:31 (tr. 9:9- 10:14, Pooley stating he does not do tandem jumps with skydivers and then admitting he still does them on occasion and last did one a couple weeks ago, and claims he has a certification to use Sigma rigs)			
204	27:08 – 27:28 (tr. 23:24 – 24:6, Kwon used a tandem rig provided by Parachute Center)			
205	32:09 – 34:15 (tr. 28:6-29:14, Pooley states his interpretation of the requirements to do tandem jumps with customers and alleges that Kwon had all those qualification, which he knows because he participated in his training)			
206	44:18 – 44:47 (tr. 36:13- 36:20, Pooley states that at the time he conducted Kwon's course, his USPA rating was suspended)			

207	45:10 – 53:42 (tr. 37:2- 43:20, Pooley describes the part he had in Kwon’s training and what had to be signed off on in terms of the training Kwon obtained at Parachute Center, and claims he does not remember what he signed off on, and claims the examiner does not have to do any part of it and if the Examiner trusts the Evaluator, the Examiner can just “take his word.” Claims that Garmashov signed Kwon’s tandem card, then says that Garmashov was in Russia and the cards were sent to him for verification, while hard copies were kept at Parachute Center)			
208	53:42 – 54:04 (tr. 43:21 – 44:2, does not Kwon was on probation at time of fatal jump. Trained him recent to fatality).			
209	56:14 – 56:46 (tr. 44:25-45:9, Kwon “was only there from his country to get the tandem rating and the - - and then go home.” It’s very difficult and expensive to get the rating elsewhere)			
210	1:01:23 -1:02:29 (tr. 48:6-49:8, Pooley claims the FAA only requires that the Examiner be trained by the manufacturer to be an Examiner, USPA rating is not required at all to perform tandem jump certification training)			

211	1:02:29 – 1:02:38 (tr. 49:9-12, “Your USPA tandem instructor examiner rating was suspended at the time of Mr. Kwon’s training; correct? A: That is correct, yes.”)			
212	1:03:52 – 1:05:24 (tr. 50:9-51:16, Kwon’s emergency procedures training; “we had an evaluator that spoke his language that did his jumps”)			
213	1:12:08 – 1:13:07 (tr. 55:2-55:18, to ensure Kwon was qualified Dause “spoke with the examiner” Q: “Who was the examiner?” A: “Me.”)			
		POOLEY 00027093		
214	3:39 – 4:36 (tr. 63:15-64:8, Q: “Are you aware that the USPA says that you were suspended at the time and were not authorized to conduct courses? A. For the USPA, yes. I was not authorized to conduct USPA courses.”; aware that 120 tandem instructors had to undergo a refresher course because of him)			
215	13:18 – 15:54 (tr. 68:16- 70:5, Pooley is shown his UPT card that expired in April 2016, claims he did not need to renew it)			
216	15:58 – 18:43 (tr. 70:6 – 71:22, Pooley identifies Garmashov’s signatures on Kwon’s paperwork, claims he just needed to be told jumps were done to verify, and confirms forms are printed pre-signed)			



217	18:44 – 20:42 (tr. 71:24 – 73:9, Pooley explains why people want USPA ratings, identifies Garmashov’s signatures on Kwon’s paperwork and confirms he wasn’t there for Kwon’s training)			
218	23:06 – 24:29 (tr. 75:3 - 76:5, “For the USPA [expiration date of examiner rating] does mater. They do care. These are USPA forms . . . Obviously Yong Kwon wanted to get his USPA licenses and ratings as well”			
Audio Excerpts from 2018 Interview of Pooley by DOT-OIG				
300	Entire recording	POOLEY_00003343		
301	8:22 - 9:37 (Pooley states that customers pay him for training and that you need a tandem rating from the manufacturer in order to teach tandems)			
302	11:19 - 12:34 (Pooley states that he does not carry any ratings now but lists the ratings he once had, including examiner. Customers would pay him and he would sign off on their paperwork. He went tandem skydiving this summer)			
303	52:23 - 52:53 (Pooley acknowledges knowing Garmashov)			
304	1:07:31 - 1:09:06 (Pooley was a tandem examiner and was the examiner of instructor that died, Kwon. He certified Kwon)			

305	1:16:29-1:17:30 (Pooley didn't sign off on Kwon's certification because he was suspended at the time. Claims he was suspended by USPA, not the manufacturer.)			
306	1:29:55 - 1:31:00 (Pooley used pre-printed documents with Garmashov's signatures)			
307	1:33:27 - 1:34:29 (Pooley provided training when Garmashov was not physically present)			
308	1:42:52 - 1:43:44 (Pooley sent Garmashov documents when Garmashov was away. Garmashov was in Russia when Kwon died.)			
309	1:43:44 -1:45:05 (Pooley didn't care whether or not Garmashov was there when Kwon was trained. His signature was just there to appease the USPA.			
310	1:49:27 - 1:50:19 (Pooley helped people tandem ratings from USPA, manufacturer or both)			
311	1:51:37 - 1:52:10 (Pooley was not forced or pressured to write letter to USPA, and not caused by the drama after the incident)			
Audio Excerpts from 2021 Interview of Pooley by DOT-OIG				
400	Entire recording	POOLEY_00002524		
401	10:47 - 11:41 (Pooley confirms email to Palomino came from him and was "very typical)			

402	14:30 - 14:39 (Garmashov not in the country when Kwon's paperwork was signed off)			
403	17:52 - 18:00 (USPA wouldn't accept Pooley's name on certification cards, so Garmashov had to sign for it)			
404	18:45 - 18:56 (Pooley trained Kwon. Garmashov was out of the country)			
Physical Evidence Seized From Pooley's Locker at Parachute Center				
500	"Tandem Instruction for Dummies" 3-ring binder (contains USPA Tandem Instructor Rating Course Proficiency UPT Tandem Instructor Certification Forms with Yuri Garmashov's preprinted signature) found in Pooley's locker	Original		
501	March 2012 USPA and UPT documents for Federico Busanello found in manilla envelope in Pooley's locker Pooley's wet and preprinted signatures	Original		
502	December 2013 USPA and UPT documents for Kertis Gilchrist found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
503	April 2014 USPA and UPT documents for Ricardo Santos found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
504	April 2014 USPA and UPT documents for Thomas Rodriguez de Oliveira found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		

505	April 2014 USPA and UPT documents for John Platner found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
506	May 2015 USPA and UPT documents for Kenton Outtrim found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
507	June 2015 USPA and UPT documents for Edgar Tokria found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
508	June 2015 USPA and UPT documents for James E. Stanley found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
509	June 2015 USPA and UPT documents for Lucas Montenegro found in manilla envelope in Pooley's locker with Pooley's wet and preprinted signatures	Original		
510	August 2015 USPA and UPT documents for Guillermo Canatta Sosa found in Pooley's locker with Garmashov's preprinted signatures	Original		
511	August 2015 USPA documents for Adam Johnson found in Pooley's locker with Garmashov's preprinted signatures	Original		
512	September 2015 USPA documents for Minsik Jeong found in Pooley's locker with Garmashov's preprinted signatures	Original		

513	September 2015 USPA and UPT documents for Jordan Van den Berg found in Pooley's locker with Garmashov's preprinted signatures	Original		
514	September 2015 USPA and UPT documents for Amit Anruesky found in Pooley's locker with Garmashov's preprinted signatures	Original		
515	September 2015 USPA and UPT documents for Luis Lopez Fleitas found in Pooley's locker with Garmashov's preprinted signatures	Original		
516	September 2015 USPA documents for Matias Baeza Parker found in Pooley's locker with Garmashov's preprinted signatures	Original		
517	September 2015 USPA documents for Eduardo Denis Kim found in Pooley's locker with Garmashov's preprinted signatures	Original		
518	September 2015 USPA documents for James Joseph Moore Garcia -Ortega found in Pooley's locker with Garmashov's preprinted signatures	Original		
519	October 2015 USPA and UPT documents for Jeanremy Boulet-Giroux found in Pooley's locker with Garmashov's preprinted signatures	Original		
Electronic Evidence seized from Computers at Parachute Center				
600	JPG document entitled "Yuri Signiture"	POOLEY_00031223		
601	PDF document entitled "Yuri UPT Waiver" containing pre-filled signature of Yuri Garmashov on a UPT Tandem Parachute Jump Agreement	POOLEY_00031231- POOLEY_00031232		

602	PDF document entitled “Yur_Rob Canopy Prof Card” containing pre-filled signature of Yuri Garmashov on a USPA Canopy Piloting Proficiency Card	POOLEY_00031155		
603	PDF document entitled “Yuri D License App Signed” containing pre-filled signature of Yuri Garmashov on a USPA License Application	POOLEY-00031182- POOLEY_00031183		
604	PDF document entitled “IRM 2015 TANDEM” containing USPA 2014-2015 Instructional Rating Manual	POOLEY_00030972- POOLEY_00031065		
605	PDF document entitled “Yuri UPT Rating Application and CCA” containing pre-filled signature of Yuri Garmashov on a UPT Tandem Instructor Certification Form	POOLEY_00031228		
606	PDF document entitled “Yuri Tandem Prof Card Signed” containing pre-filled signature of Yuri Garmashov on a USPA Tandem Instructor Rating Course Proficiency Card	POOLEY_00031226- POOLEY_00031227		
607	PDF document entitled “Yuri Signed New UPT Logbook” containing pre-filled signature of Yuri Garmashov on a UPT Tandem Instructor Training Logbook	POOLEY_00031214- POOLEY_00031221		
608	PDF document entitled “IRM TANDEM” containing Tandem Instructor Rating Course manual	POOLEY_00031102- POOLEY_00031151		
609	JPG image entitled “Yuri initials”	POOLEY_00031185		
610	PDF document entitled “Yuri CanopyProfCard Complete” containing pre-filled signature of Yuri Garmashov on a USPA Canopy Piloting Proficiency Card	POOLEY_00031159		

611	PDF document entitled “Yuri Tandem Prof Card Complete” containing pre-filled signatures of Yuri Garmashov on a USPA Tandem Instructor Rating Course Proficiency Card	POOLEY_00031224- POOLEY_00031225		
612	JPG image of Yuri initials entitled “Yuri initials.cb62bddd389b48898f2e5244977cb2c5.jpg”	POOLEY_00031184		
613	PDF document entitled “Yuri Canopy Prof Card” containing pre-filled signatures of Yuri Garmashov on a USPA Canopy Piloting Proficiency Card	POOLEY_00031158		
614	PDF document entitled “Yuri Signed Complete Paperwork Package UPT and USPA” containing pre-filled signatures of Yuri Garmashov on a USPA membership application	POOLEY_00031194- POOLEY_00031213		
615	PDF document entitled “Yuri B,C,D-License App Complete” containing pre-filled signatures of Yuri Garmashov on a USPA license application	POOLEY_00031156- POOLEY_00031157		
616	JPG image entitled Yuri Signiture.cb62bddd389b48898f2e5244977cb2c5.jpg	POOLEY_00031222		
617	PDF document entitled “Yuri Complete Paperwork Package” containing pre-filled signatures of Yuri Garmashov on a USPA documents	POOLEY_00031162- POOLEY_00031181		
618	PDF document entitled “Lachlan Mackay USPA” containing Tandem Instructor Rating Course Proficiency Card for Lachlan Mackay	POOLEY_00031152- POOLEY_00031154		
619	JPG image entitled “Rob Initials”	POOLEY_00033054		
620	JPG image entitled “Rob Signature”	POOLEY_00033055		

Emails seized from Computers at Parachute Center				
700	Email exchange between Parachute Center and Lassi-Pekka Ruuskanen dated October 3, 2015, identifying Pooley as tandem examiner	POOLEY_00030962		
701	Email exchange between Parachute Center and Gavin Creagh dated August 17, 2015, identifying Pooley as tandem examiner	POOLEY_00030963		
702	Email from Parachute Center to Rob Pooley dated June 28, 2016, forwarding message from Fabricio Palomino (Skydive Baja) re: tandem ratings	POOLEY_00030967		
703	Email from Parachute Center to Rob Pooley dated March 21, 2016, forwarding message from Mahesh Birajdar re: Tandem Master Course	POOLEY_00030968		
704	Email from Parachute Center to Rob Pooley dated August 1, 2016, forwarding message from Alexis Patterson re: tandem master lessons	POOLEY_00030965		
705	Email from Parachute Center to Lachlan Fox, copying Rob Pooley, dated October 1, 2016, re: tandem ratings	POOLEY_00030966		
706	Email exchange between Parachute Center and Mickey Jeffet dated July 1, 2015, identifying Rob Pooley as tandem examiner	POOLEY_00030969- POOLEY_00030971		
707	Email exchange between Parachute Center and Richard Keir dated January 5, 2016, identifying Rob Pooley as tandem examiner	POOLEY_00030964		
Search warrant photos				
800	Search warrant location sketches (Parachute Center)	POOLEY_00027119- POOLEY_00027120		
801	External image of Parachute Center with "Skydiving" sign	POOLEY_00027124		



802	External image of entrance to Parachute Center	POOLEY_00027153		
803	External image of doorway to Parachute Center hangar	POOLEY_00027207		
804	External image of area adjoining hangar	POOLEY_00027208		
805	Image of computer workstation in Parachute Center	POOLEY_00027238		
806	Image of laptop at computer workstation in Parachute Center	POOLEY_00027239		
807	Image of lockers in Parachute Center	POOLEY_00027241		
808	Image of Parachute Center showing television displays	POOLEY_00027243		
809	Image of Parachute Center showing couches	POOLEY_00027245		
810	Image of Parachute Center workstations	POOLEY_00027247		
811	Image of different angle of Parachute Center workstations	POOLEY_00027248		
812	Image of Parachute Center blue practice mats	POOLEY_00027261		
813	Different angle of Parachute Center blue practice mats	POOLEY_00027262		
814	Image of Parachute Center television displays	POOLEY_00027268		
815	Different angle of Parachute Center blue practice mats	POOLEY_00027270		
816	Image of Parachute Center shelving	POOLEY_00027274		
817	Different angle of Parachute Center blue practice mats	POOLEY_00027275		
818	Image of Pooley workstation at Parachute Center	POOLEY_00027277		
819	Image of whiteboard at Parachute Center	POOLEY_00027280		
820	Different image of whiteboard at Parachute Center	POOLEY_00027281		
821	Image of tents at Parachute Center	POOLEY_00027286		
822	Different angle of tents at Parachute Center	POOLEY_00027287		
823	Different angle of tents at Parachute Center	POOLEY_00027288		

824	Image of counters at Parachute Center	POOLEY_00027299		
825	Different angle of counters at Parachute Center	POOLEY_00027300		
826	Different angle of tents at Parachute Center	POOLEY_00027304		
827	Image of whiteboard at Parachute Center	POOLEY_00027319		
828	Image of multiple whiteboards at Parachute Center	POOLEY_00027320		
829	Image of blue mats and shelves at Parachute Center	POOLEY_00027376		
830	Image of safe with cash	POOLEY_00027388		
831	Image of "Photo"/ "Video" area inside Parachute Center	POOLEY_00027399		
832	Image of workstation at Parachute Center	POOLEY_00027400		
Emails obtained from Google's production of the rpooley75@gmail.com account				
900	Google Rule 902(11) certificates	<u>POOLEY_00032978-</u> <u>POOLEY_00032991</u>		
901	January 30, 2014, email from Tom Noonan to Pooley, copying Stokes, re: UPT Tandem Examiner Rating follow up	POOLEY_00021008- POOLEY_00021009		
902	January 30, 2014 email exchange among Rob Pooley, Tom Noonan (UPT) and Jay Stokes (copied) Re: UPT Tandem Examiner Rating follow up	POOLEY_00020967- POOLEY_00020969		
903	June 18, 2015 cover email and attached letter from Jason Putnam Gordon re: Prima Facie Notice of Violation	POOLEY_00020867- POOLEY_00020868		
904	July 22, 2015 email from Google to rpooley75@gmail.com, advising that the password for parachutecentervideodesk@gmail.com was reset	POOLEY_00021025- POOLEY_00021026		
905	August 7, 2015 email from Ray Lallo to Pooley, copying Crouch advising Pooley of the decision to suspend his Examiner ratings	POOLEY_00020972 POOLEY_00020970- POOLEY_00020971		

906	August 17, 2015 Email from Kathy Dause to tandem candidate, copying Pooley, re: "Tandem rating in September"	POOLEY_00020959		
907	August 17, 2015 email from Pooley to himself, attaching images of his own initials and signature	POOLEY_00020978- POOLEY_00020982		
908	August 17, 2015 5:57 pm email from Pooley to himself, attaching image of Garmashov's signature, with subject: "Yuri signature"	POOLEY_00021029- POOLEY_00021031		
909	August 17, 2015 6:25 pm email from Pooley to himself, attaching image of Garmashov's initials, with subject line: "Yuri"	POOLEY_00021032- POOLEY_00021034		
910	August 18, 2015 email and attached letter from Tom Noonan to Pooley re Letter of Suspension	POOLEY_00020842- POOLEY_00020843		
911	August 10, 2015 - August 28, 2015 email exchange between Rob Pooley and Jim Crouch in which Pooley affirms he understands the terms of the suspension	POOLEY_00020906- POOLEY_00020910		
912	September 4, 2015 email from Rob Pooley to USPA attaching letter appealing suspension	POOLEY_00020973- POOLEY_00020975		
913	January 5, 2016 – January 18, 2016 email exchange between Rob Pooley and Richard Keir re: Tandem Rating Course Lodi	POOLEY_00020957- POOLEY_00020958		
914	January 18, 2016 email from Pooley to Ryan Alex Scott Re: "Tandem"	POOLEY_00021006		
915	April 4-11, 2016 email exchange between Rob Pooley and Jack Elford re: Tandem course opportunities	POOLEY_00020938- POOLEY_00020939		

916	July 22, 2016-July 25, 2016 email exchange between Jason Putnam Gordon (USPA) and Robert Pooley re: Reinstatement Request	POOLEY_00020931- POOLEY_00020932		
917	August 2, 2016 email and attached letter from Jan Meyer (USPA) to Rob Pooley denying his request for Examiner rating reinstatement	POOLEY_00020877- POOLEY_00020879		
918	August 10, 2016 cover email and attached letter from Jim Crouch (USPA) to Rob Pooley administratively suspending Pooley's membership and ratings pending USPA's investigation.	POOLEY_00021010- POOLEY_00021013		
918r	August 10, 2016 cover email and attached letter from Jim Crouch (USPA) to Rob Pooley administratively suspending Pooley's membership and ratings pending USPA's investigation (redacted)	POOLEY_00021010- POOLEY_00021011		
919	September 22, 2016 cover email from Jim Crouch (USPA) and attached Notice of Violation letter from Josh Hall to Robert Pooley	POOLEY_00021014- POOLEY_00021016		
<u>920</u>	<u>October 3, 2015, email from Rob Pooley to michael@eyedeaworx.com re: parachutecentervideodesk@gmail.com</u>	<u>POOLEY_00020933-20934</u>		
Emails obtained from Google's production of the yurig.garmashov@gmail.com account				
1000	September 1, 2016 email from Jim Crouch (USPA) to USPA Tandem Instructor Examiners re: "Tandem Examiners: Immediate USPA Policy on Certain Tandem Instructors/Candidates" and attachments	POOLEY_00020647 POOLEY_00020648 POOLEY_00020640- POOLEY_00020646		

1001	<u>July 6, 2016 emails between Jim Crouch and Yuri Garmashov re: "Candidate qualifications"</u>	<u>POOLEY_00020457-POOLEY_00020458</u>		
Documents related to Pooley's signed and notarized letters (emails covered by Rule 902(11) certificate)				
1100	September 8, 2016 email from Yuri Garmashov to Josh Hall (USPA) attaching letter from Rob Pooley	POOLEY_000203432-POOLEY_00020345		
1101	Photo of original letter signed by Rob Pooley taken by SA Keum	POOLEY_00002054-POOLEY_00002055		
1102	September 5-6, 2016 email from Evan Beecher to Garmashov re: "Potential draft letter"	POOLEY_00020526-POOLEY_00020529		
1103	September 7, 2016 email from Garmashov to Pooley: "This is the letter. Please c" attaching the scanned letter	POOLEY_00020394-POOLEY_00020396		
1104	September 8, 2016 email from Yuri Garmashov to Rob Pooley re: letter containing the above letter in the body	POOLEY_00020362		
1105	January 27, 2017 email and attached letter from Rob Pooley to USPA (Jan Meyer, Jim Crouch) and Garmashov re: "Letter for Yuri G" saying that "to the best of my knowledge would have had no information as to what was happening in his absence."	POOLEY_00020341-POOLEY_00020342		
1106	Notary book with entry on page 119 reflecting that on February 2, 2017, Robert Pooley notarized a letter attesting to "Yuri Garmashov involvement in a tandem jump"	original		
1107	Picture taken by SA Keum of letter by Rob Pooley and notarization certificate dated February 2, 2017 by Bobbi L. Lewis	POOLEY_00002050-POOLEY_00002051		

1108	Notary book with entry on page 13 reflecting on March 29, 2019 Robert Pooley notarized a "letter Re: Emails"	original		
1109	Picture of letter by Rob Pooley and notarization certificate dated March 29, 2019 by Michael Pierce	POOLEY_00002048- POOLEY_00002049		
Photos taken by Peter Swan				
1200	Photograph of Rob Pooley in a tandem parachute rig	POOLEY_00001665		
Documents related to DOT-OIG SA Corry Noel				
1300	Report re Forensic Examination of Devices	POOLEY_00030949- POOLEY_00030955		
1301	DOT-OIG Forensic Media Collection Form	POOLEY_00001766- POOLEY_00001800		
1302	DOT-OIG FMC Pictures of Computer with serial number Z3TQ24TJ	POOLEY_00001823- POOLEY_00001829		
1303	DOT-OIG FMC Pictures of Pooley's Locker	POOLEY_00001831		
1304	DOT-OIG FMC Pictures of Hard Drive with Serial Number WCC4M1084583	POOLEY_00001847		
1305	Screenshot of folder structure of folder "Users" on Computer with serial number Z3TQ24TJ	POOLEY_00033038		
1306	Screenshots of contents of "Complete Paperwork Package" folder on Computer with serial number Z3TQ24TJ	POOLEY_00033039- 40		
1307	Screenshot of folder structure of folder "Windows Live Mail" on Computer with serial number Z3TQ24TJ	POOLEY_00033041		
1308	Screenshots of contents of "Sent Mail" folder on Computer with serial number Z3TQ24TJ	POOLEY_00033042- 43		
1309	Screenshot of folder structure of folder "shares" on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033044		

1310	Screenshots of contents of folder "Robs Docs" on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033045-46		
1311	Screenshots of contents of folder "New Docs" on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033047-48		
1312	Screenshots of contents of folder "Candidate Paperwork" on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033049-50		
1313	Screenshot of folder structure of folder "Rob to sort" on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033051		
1314	Screenshots of contents of folder "transcoded_files" on Hard Drive with Serial Number WCC4M1084583	POOLEY_00033052-53		
Other Customs and Border Crossing Records				
1400	Border Crossing Record Certification	POOLEY_00030904-POOLEY_00030905		
1401	Border crossing records reflecting that Sangyeul Jeong entered the U.S. on June 5, 2016 and departed the U.S. on August 31, 2016	POOLEY_00030908-POOLEY_00030909		
1402	Border crossing records reflecting that Carlos Obaid entered the U.S. on June 16, 2016 and departed the U.S. on October 11, 2016	POOLEY_00030914-POOLEY_00030915		
1403	Border crossing records reflecting that Carlos Martinez entered the U.S. on June 9, 2016 and departed the U.S. on October 10, 2016	POOLEY_00030916-POOLEY_00030917		
1404	Border crossing records reflecting that Lachlan Mackay entered the U.S. on March 25, 2016 and departed the U.S. on November 30, 2016	POOLEY_00030918-POOLEY_00030919		

1405	Border crossing records reflecting that Danny Overeem entered the U.S. on June 14, 2016 and departed the U.S. on August 26, 2016	POOLEY_00030920- POOLEY_00030921		
<u>Documents related to Jay Stokes</u>				
<u>1501</u>	<u>Examiner training documents provided by Jay Stokes</u>	<u>POOLEY_00032590- POOLEY_00032594</u>		
<u>Emails from parachutecentervideodesk@gmail.com account</u>				
<u>1600</u>	<u>August 24, 2015, email from Rob Pooley to terri@uptvector.com re: paperwork for Jason Spurgeon</u>	<u>POOLEY_00030711</u>		
<u>1601</u>	<u>August 24, 2015 email from Rob Pooley to Yuri Garmashov re: Jason Spurgeon paperwork</u>	<u>POOLEY_00030759</u>		
<u>1602</u>	<u>August 18, 2016 email from Rob Pooley to rpooley75@gmail.com with attachment</u>	<u>POOLEY_00030684- 30685</u>		

Dated: May 15, 2024

PHILLIP A. TALBERT  
United States AttorneyBy: /s/ KATHERINE T. LYDON  
KATHERINE T. LYDON  
DHRUV M. SHARMA  
Assistant United States Attorneys